

United States District Court For the Southern District
of Florida

Junior Diessy Simon

Vs.

Civil Division

Case No:

Extended Stays Hotel Headquarters

Jury Trial ☐ Yes ☒ No

City of Deerfield Beach

(Bso district 10) Tyler Anderson

Christopher Casasnovas (Bso district 10)

Nicholas Fernandez (Bso district 10)

Osvaldo Mondouys Brito (Bso district 10)

Michael Morales (Bso district 10)

Abrams K. (Bso district 10)

Broward Sheriff Office (Gregory Tony)

FILED BY MC D.C.

JUL 12 2024

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

Civil Rights Violations And Claims

Comes now, plaintiff's pursuant To Federal rule of Civil Procedure 5.2 and 42 U.S.C. of 1983, are now suing defendants and claims requested due To US Constitutional Rights Violations, illegal Search and seizures, illegal Traffic Stops, Negligent Securities, Premises Liabilities, Discriminations, Product Liabilities, injuries of plaintiff foot or ankles, loss wages and false imprisonment, Failure To Warned Residence of Police Presence Conducting Traffic stop in their premises.

COMPLAINT

Plaintiff's Junior Simon have been Resides now at Extended Stays hotel for over 6 months with his friends, at the location of 1400 Sw 11th way Deerfield Beach Florida. Junior feels like the property was safe for him To live there with his friends and started a new job as chef from shop while working there. However, all of that changes on his days off. I, Junior Simon was sitting in my friend

Car, When I did noticed a Tahoe Truck Come park behind the car I was in with No Siren Light; I was Skeptical so I started the car To move it To the front of The Building for a Safer Area. That's When The Tahoe Truck put his emergency light on letting me know that they were police officer. I parked the car in the front Parking near the front door entrance of the Hotel. That's When Officer Tyler Anderson saw my name and place me under Arrest for an illegal warrant That was and were executed by Asst. State attorney Kathryn Heaven. While I was under Arrest, No Officer(s) read me my miranda Rights, I Never Consents To any Search on Me or inside the Vehicles. Therefore, the officers That were on the scene conducted their own Search and Seizures without a Search warrant, which were on Sept. 26, 2023 around 9 AM. I Was injured in both of my ankles due To Tight Strickles that were place on my ankles and I was denied Medical upon arrival To the Main Jail, I was unable To Walk for Two months straight and Im still Traumatized by these officers Unlawful Conducts. That's when I knew that extended stays hotel wasn't a safe place To be, The Hotel Management never displayed any Warning Signs To Resident or guesses about how enforcement conducting Traffic stop at their premises in unmarked Vehicles. This is a Safety Threats To Any Residence and guesses; Violating the 14th amendment US. Constitutional Rights. As a Result of that, I was arrested, Injured, Traumatized, defamed of my Character, false allegations on Extended stays commercial premises. The City of Deerfield Beach is also Responsible for these officers Misconducts and Unlawful procedures by putting people's Life at Risk and in danger. This is a Negligent of Securities, Discriminations, illegal Traffic stops, loss Wages, Premises Liabilities and More. All defendants must Take Full responsibilities for their involvements.

Causes And Effects

When plaintiff's, Junior Simon was Arrested on Sept. 26, 2023, it caused a severe effects on his life physically, emotionally and mentally; The Causes &

Effects on plaintiff(s) are: Punitive damages, monetary damages, Emotionally distress, mentally distress, physically distraught, Constitutional Rights violations, Discriminations, illegal searched and seizures, illegal Traffic stops, Negligent Securities, Premises Liabilities, Product Liabilities, loss wages, Ankle injuries, Failure To Display Signs of Police Presence, Failure To Warns Residence or guesses of Police Presence Conducting Traffic stop in their premises, intellectual property and defamations. Defendants must Take full accountabilities and Responsibilities For plaintiffs Causes and effects Liabilities and The reparation of his Life and Financial stability and resources.

Request demand Relief Sought

Here now, The plaintiff request demand relief Sought for the Following:

- ☒ Request demand Punitive damages = \$40,000,000
- ☒ Request demand monetary damages = \$40,000,000
- ☒ Request demand Emotional distress relief = \$40,000,000
- ☒ Request demand mentally distress relief = \$40,000,000
- ☒ Request demand physically distraught relief = \$40,000,000
- ☒ Request demand Constitutional Rights violations relief = \$40,000,000
- ☒ Request demand Negligent Securities relief = \$40,000,000
- ☒ Request demand Premises liabilities & Ankle injuries Relief = \$40,000,000
- ☒ Request demand illegal Traffic stop relief = \$40,000,000
- ☒ Request demand Product liabilities and loss wages relief = \$40,000,000
- ☒ Request demand Failure To Display Warning Signs Relief = \$40,000,000
- ☒ Request demand Libel/slander defamations Relief = \$40,000,000
- ☒ Request demand defendants Taken full Accountabilities Relief = \$40,000,000
- ☒ Request demand Reparations of plaintiff Life and Financial relief = \$40,000,000
- ☒ Request demand plaintiff Stabilities and resources Relief = \$40,000,000

Where Now, plaintiff(s) request demands full Judgment in the Sum of \$600,000,000, Together with Court Cost which the Court may Assess. The foregoing is a Just and True Statement of the Amount owing by the defendants.

Verification

Duly Sworn under Oath Says that the plaintiff's in this Action and knows the Content of the Above claim and Complaint is True and correct of my own knowledge and understanding the matters and informations are True, Presiding on this 19th day of June 2024.

Junior Dressy Simon
Plaintiff(s)

06/19/24
Date

James Bozier
Witness

06-19-2024
Date

This letter originates from
Broward County Jail Facility.
Inmate mail is uncensored and
the Sheriff cannot assume
responsibility for its contents.

REC'D BY _____ D.C.
JUL 11 2024
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23-20035
Po Box 407037
Fort Lauderdale, FL 33340

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United States District Court
Clerk of Court
400 North Miami Avenue
Miami, Florida 33128

33128-771699

